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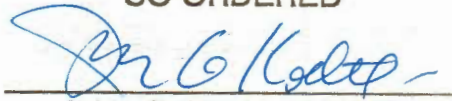
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October 21, 2021

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED
SO ORDERED


John G. Koeltl, U.S.D.J.

10/21/21

Re: *United States v. Hayes, et al.*, 20 Cr. 500 (JGK)

Dear Judge Koeltl:

We represent Defendant Benjamin Delo and respectfully submit this letter on behalf of Mr. Delo and Defendants Arthur Hayes and Samuel Reed (the "Defendants"), whose counsel are copied on this letter.

Pursuant to the Court's Order of October 13, 2021, ECF No. 143, Defendants will be submitting their reply to the government's opposition to the motion for a bill of particulars, ECF No. 126. The reply memorandum and any supporting papers will be delivered to Chambers in both hard copy and electronic form.

Having conferred with the government pursuant to Rule VI.A.2 of the Court's Individual Practices, we respectfully seek leave from the Court to file the reply papers under seal at the present time because the filing includes materials the government has designated "Confidential" or "Sensitive" pursuant to the protective orders that have been entered in this case. ECF Nos. 23, 41, 55. The parties will confer on proposed redactions.

We are available at the Court's convenience to discuss any questions. Thank you.

Respectfully submitted,

/s/ Patrick J. Smith

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Cc: James J. Benjamin, Jr. (counsel for Arthur Hayes)
Douglas K. Yatter (counsel for Samuel Reed)
Benjamin Naftalis (counsel for Samuel Reed)
Harlan A. Levy (counsel for Ben Delo)
All Counsel of Record (via ECF)